

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CENGAGE LEARNING, INC., BEDFORD,
FREEMAN & WORTH PUBLISHING GROUP, LLC
d/b/a MACMILLAN LEARNING, MCGRAW HILL
LLC, and PEARSON EDUCATION, INC.,

Plaintiffs,

v.

DOES 1 – 50 d/b/a Library Genesis, bookwarrior,
cdn1.booksdl.org, jlibgen.tk, libgen.ee, libgen.fun,
libgen.gs, libgen.is, libgen.lc, libgen.li, libgen.pm,
libgen.rocks, libgen.rs, libgen.space, libgen.st,
libgen.su, library.lol, and llhf.com,

Defendants.

Civil Action No. 23-cv-08136-CM

PLAINTIFFS' REQUEST FOR ENTRY OF DEFAULT

TO: RUBY J. KRAJICK, CLERK OF COURT
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiffs Cengage Learning, Inc., Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning, McGraw Hill LLC, and Pearson Education, Inc. (collectively, "Plaintiffs") respectfully request entry of default against all Defendants in this action. No Defendant has responded to the Complaint (ECF No. 1) or otherwise appeared and defended in this action. *See* Declaration of Kevin Lindsey, filed herewith ("Lindsey Decl."), ¶ 5.

On October 17, 2023, Plaintiffs caused the Complaint and Summons to be served on Defendants by electronic means pursuant to the Court's October 10, 2023 Memo Endorsement granting Plaintiffs' Motion to Serve Defendants by Email (ECF No. 17) (the "Alternative Service Order"). *See* Affid. of Service (ECF No. 20); Lindsey Decl. ¶ 4. More than 30 days have lapsed

since such service was completed.

Due to Defendants' default, Plaintiffs have been unable to further identify the Defendants beyond their "doing business as" information set forth in the Complaint and the Alternative Service Order. *See* Lindsey Decl. ¶ 6. Accordingly, in this default proceeding, Defendants continue to be identified as "Does 1-50," along with the following additional information:

Defendant	DBA	Email Addresses
Does 1-50	Library Genesis Book Warrior libgen.is libgen.rs libgen.su libgen.st jlibgen.tk library.lol	https://sarek.fi/contact/libgen.is/registrant
		vlaimir@mail.ru
		https://sarek.fi/contact/libgen.st/registrant
		https://tieredaccess.com/contact/c92b9688-d38a-4508-835a-1a40142bb777
Does 1-50	Library Genesis Book Warrior cdn1.booksdl.org llhlf.com libgen.ee libgen.rocks libgen.space libgen.gs libgen.li libgen.lc libgen.pm	https://porkbun.com/whois/contact/registrant/llhlf.com
		https://rwhois.internet.ee/contact_requests/new?domain_name=libgen.ee&locale=en
		https://tieredaccess.com/contact/7b899793-c2d9-479c-89b6-e03844717043
		09d55b0b65744bdf9d09dabb08c22a2f.protect@withheldforprivacy.com
		ianzlib@protonmail.com
		ianzlib@protonmail.com
		https://sarek.fi/contact/libgen.pm/registrant

Does 1-50	Library Genesis Book Warrior libgen.fun	2b67ebed9ff14b2da8b124baf5129faa.protect@withheldfor privacy.com
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DATED: November 21, 2023

Respectfully submitted,

/s/ Kevin Lindsey

Kevin Lindsey (*pro hac vice*)

Matthew J. Oppenheim

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